

JPS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

Kabir Elohim Isreal)
Plaintiff,) Civil Action No.: 24-CV-18-JPS
v.)
Aileene Chovance, Hector Claudio,))
Guy Fraley, and Kenton Burtch))
Defendants,))

KABIR'S FIRST NOTICE OF DISCOVERY

NOTICE IS HEREBY GIVEN, Kabir Elohim Isreal (hereinafter "Plaintiff") has propounded **twenty-five (25) Interrogatories, fourteen (14) Requests for Admissions, and thirteen (13) Requests for Productions** against the above named Defendants on **MARCH 3RD, 2025**.

DRAFTED & SUBMITTED MARCH 3RD, 2025..


/S/Kabir Elohim Isreal

Plaintiff, Pro se

PO Box 114

Buckeye, AZ 85326 602-461-6159

ambassador@thebiblicalnationofisrealregistry.world

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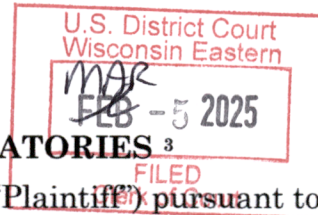
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

Kabir Elohim Isreal)	
<i>Plaintiff,</i>)	Civil Action No.: 24-CV-18-JPS
v.)	
Aileene Chovance, Hector Claudio,		
Guy Fraley, and Kenton Burtch)	
<i>Defendants,</i>)	



KABIR'S FIRST SET OF INTERROGATORIES³

COMES NOW, Kabir Elohim Isreal (hereinafter "**Plaintiff**") pursuant to **Rule 33** of the **Federal Rules of Civil Procedure** to propound the following Interrogatories (hereinafter "**INT**") on the above named Defendants as follows:

INT 1: Defendants state your full name, principal home address, all previous principal home addresses for the last five (5) years, last four of your social security number, date of birth, marital status, your previous places of employment and address for the last five (5) years and your job title and duties you perform there (this also includes being self-employed), your employer's name, address, and job title and duties you perform there (this also includes being self-employed).

INT 2: Defendants state your monthly and annual income numerical amount since **JANUARY 2020**, and your deductions from the same since same.

INT 3: Defendants you contend, in a vague and conclusory manner, thirteen (13) or more defenses. State in precise factual detail how each of the negative and affirmative defenses are applicable, and which of Plaintiff's causes do you allege said defenses are applicable too.

INT 4: Defendants please list and identify with detail each and every physical, tangible, intangible, and digital asset owned by you.

³ Plaintiff hereby requests of Defendants a second set of 25 Interrogatories and that he be allowed to proffer same until **JUNE 1ST, 2025**.

INT 5: Defendants have you directly or indirectly transferred, conveyed or disposed of any cash, physical, tangible, intangible, or digital assets or other items of value with a cost or fair market value of \$100 or more during the period of **JANUARY 4TH, 2024** to present? If your answer is in the affirmative, please list and identify with detail each and every item, cash amount, and physical, tangible, intangible, and digital asset.

INT 6: Defendants state whether you have filed with the IRS Federal Form 1040 income tax returns for the years 2020 to 2025. If your answer is affirmative, state: (a) the date that each return was filed; and (b) the address or location of the IRS Service Center where the return was filed.

INT 7: Defendants state whether you have filed State income tax returns for 2020 to 2025. If your answer is affirmative, state: (a) the date that each return was filed; (b) the state with whom the return was filed; and (c) the address where the state return was filed.

INT 8: Defendants Chovance and Claudio describe in detail every fact, observation, and statement from Plaintiff that you relied upon to justify detaining him on **MARCH 21ST, 2023**, after he flagged you down for assistance. Specify whether you believed he was a suspect and why, witness and why, or victim and why at that moment, and explain how this justified placing him in a police vehicle.

INT 9: Defendants Provide a complete timeline of Plaintiff's detention from the moment you first encountered him on **MARCH 21ST, 2023**, until he was transported to Milwaukee County Jail, including the exact times he was moved between vehicles, who authorized each move, and whether he was free to leave at any point. Explain why this detention lasted over two hours.

INT 10: Defendants detail the steps you took to verify Plaintiff's identity after he provided the name "Kabir Elohim Isreal," including what information you entered into the in-car computer, the results received, and any follow-up actions before

detaining him further. Explain why you did not release Plaintiff if no warrants or criminal history appeared under his name.

INT 11: Defendants Chovance and Claudio explain the specific facts and circumstances under which you took possession of Plaintiff's gun and passport on **MARCH 21ST, 2023**, including who seized each item, the legal justification for doing so, and why Plaintiff has to ask for his property to be returned to him following the dismissal of his criminal case on **AUGUST 9TH, 2023**.

INT 12: Defendant Chovanec: You admitted Plaintiff did not appear to have a weapon when you approached but also stated he had a gun in his hand that he set down. Reconcile these statements, and provide any contemporaneous notes, reports, or witness accounts corroborating your recollection of the gun's location.

INT 13: Defendants Claudio and Chovanec: You denied demanding Plaintiff surrender his gun or using a hostile tone, yet claimed insufficient knowledge to confirm or deny hand placement on your weapons. Explain how you can deny Plaintiff's account without certainty of your own actions, and produce any body camera footage and audio from **MARCH 21ST, 2023**, to support your version.

INT 14: Defendants Burtch and Fraley: You denied saying, "You are not under arrest but we will let you go once we can identify who you are," explain why you both continued detaining Plaintiff if you believed he was not under arrest, especially after his self-defense claim.

INT 15: Defendants Claudio and Chovanec: You claimed Plaintiff entered your vehicle willingly and that you used an in-car computer for a warrant check, but denied locking the door or radioing dispatch. Using all incident reports, computer logs, and radio communications from **MARCH 21ST, 2023**, and explain any differences between these records and your claim.

INT 16: Defendants have you been subject to any complaints, disciplinary actions, or lawsuits in the past five (5) years alleging unlawful detention, seizure, or

misrepresentation of arrest status? If so, provide the dates, nature of allegations, and outcomes.

INT 17: Defendants, did you believe on **MARCH 21ST, 2023**, that Plaintiff's name "Kabir Elohim Isreal," which could not be immediately verified in your system, constituted a crime under Wisconsin law? If yes, specify the statute or legal basis you relied upon, and describe all facts supporting that belief at the time.

INT 18: Defendants the moment each of you decided to detain Plaintiff in your police vehicle, what specific, articulable facts—beyond his identity not being immediately verifiable—did you rely upon to form reasonable suspicion that he had committed, was committing, or was about to commit a crime? Provide the exact sequence of those observations.

INT 19: Defendants what training and policies from the Milwaukee Police Department have you received regarding whether an individual's inability to have their identity immediately verified constitutes reasonable suspicion or a crime under Wisconsin law? Provide dates of training and summaries of relevant guidelines.

INT 20: Defendants explain how Plaintiff's unverified identity contributed to the decision to detain him for over two hours on **MARCH 21ST, 2023**, including whether you believed this duration was necessary solely to ascertain his identity.

INT 21: Defendants did you follow Milwaukee Police Department policies and Wisconsin law requiring specific, articulable facts beyond an unverified identity to detain an individual on **MARCH 21ST, 2023**? If yes, produce the policy and explain how Plaintiff's case met those criteria; if no, state why you deviated.

INT 22: Defendants state whether or not any insurance or indemnification policies exist around or in the time period of **MARCH 21ST, 2023** that may satisfy part or all of a judgment that may be entered in this action; or to indemnify or reimburse for payments made to satisfy such judgment? If so, please state as to each insurance agreement or policy its complete contents, including: (a) Name, address and


telephone number of insurer or indemnitor; (b) Name, address and telephone number of each named insured or indemnitee; (c) Each type of coverage provided; (d) Limits of each type of coverage provided; (e) Amount of deductible as to each coverage; (f) Policy period coverage; and (g) Policy number.

INT 23: Defendants state in precise years, months, or both that you have been a law enforcement officer, and how many arrests you have made within the last five (5) years.

INT 24: Defendants were either of your police vehicles used on **MARCH 21ST, 2023** equipped with rear-door security features called “Rear Door Inoperable Handles” or “Police Rear Door Lock Disable”? If so, have you ever used this feature? If so, explain how this feature works.

INT 25: Defendants did either of you use a Ford Police Interceptor Utility police vehicle, Chevrolet Tahoe Police Pursuit Vehicle police vehicle, Ford Crown Victoria Police Interceptor police vehicle, or any unmarked commonly used police vehicles of the Milwaukee Police Department on **MARCH 21ST, 2023**? If so, please state its model number, year of make, and features. If not, please state the correct model, its model number, year of make, and features

DRAFTED & SUBMITTED MARCH 3RD, 2025.


/S/Kabir Elohim Isreal

Plaintiff, Pro se

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Kabir Elohim Isreal)
Plaintiff,)
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Aileene Chovance, Hector Claudio,
Guy Fraley, and Kenton Burtch)
Defendants,)

Civil Action No. 24-CV-18-JPS



KABIR'S FIRST SET OF REQUESTS FOR ADMISSIONS ¹

COMES NOW, Kabir Elohim Isreal (hereinafter "Plaintiff") pursuant to **Rule 36 (a) (1)** of the **Federal Rules of Civil Procedure** for Requests for Admissions (hereinafter "RFA") of Defendants as follows:

RFA 1: Defendants Chovance and Claudio admit that on **MARCH 21ST, 2023**, when Plaintiff flagged you down for assistance, you had no specific, articulable facts indicating he had committed a crime before you exited your vehicle and approached him.

RFA 2: Defendants admit that, at the time each of you placed Plaintiff in your police vehicle on **MARCH 21ST, 2023**, neither of you had observed any physical evidence or received any witness statements, other than Plaintiff's, indicating he had committed a crime.

RFA 3: Defendants admit, jointly, that each of you caused Plaintiff to be detained in your police vehicles for over two hours on **MARCH 21ST, 2023**, primarily to verify his identity after he provided the name "Kabir Elohim Isreal."

RFA 4: Defendants admit that neither of you possessed an arrest warrant, search warrant, nor Plaintiff's consent, when each of you caused him to be detained in your police vehicles for over two hours and took possession of his personal effects on **MARCH 21ST, 2023**.

¹ Plaintiff hereby reserves his right to proffer his remaining thirty-six (36) Requests for Admissions against Defendants until **JUNE 1ST, 2025**.

RFA 5: Defendants admit that, as of **FEBRUARY 27TH, 2025**, neither of you have returned Plaintiff's personal effects, seized on **MARCH 21ST, 2023**.

RFA 6: Defendant Chovanec: Admit that your statement in Answer ¶12—that Plaintiff “had a gun in his hand” but set it down before the interaction began—conflicts with your admission that he “did not appear to have a weapon” when you approached him.

RFA 7: Defendants admit that, within the past five years, each of you have been the subject of at least one complaint or investigation by a law enforcement agency where you are or were employed, or a civilian alleging misconduct related to unlawful detention or seizure.

RFA 8: Defendants admit that each of you knew the police vehicles that each of you used on **MARCH 21ST, 2023** were equipped with rear-door security features called “Rear Door Inoperable Handles” or “Police Rear Door Lock Disable”.

RFA 9: Defendants admit that each of you knew the police vehicles that each of you used on **MARCH 21ST, 2023** were equipped with rear-door security features that allows you to lock the rear doors from the front *via* hidden lock plungers or electronic controls.

RFA 10: Defendants admit that each of you knew the police vehicles that each of you used on **MARCH 21ST, 2023** could be locked from the front seat and contained no interior handles or manual overrides accessible from the back seat.


RFA 11: Defendants admit that each of you knew the police vehicles that each of you used on **MARCH 21ST, 2023** contained rear door locks that can be disabled from the inside and controlled solely by you in the front seat.

RFA 12: Defendants admit that each of you knew the police vehicles that each of you used on **MARCH 21ST, 2023** was equipped with electronic locks controlled from the driver's position or manual overrides inaccessible from the rear.

RFA 13: Defendants admit that each of you knew the police vehicles that each of you used on **MARCH 21ST, 2023** was equipped with locks controlled from the front and no interior access for detainees.

RFA 14: Defendants admit that you used one or more of the abovementioned rear-door security features against Plaintiff on **MARCH 21ST, 2023**.

DRAFTED & SUBMITTED MARCH 3RD, 2025..


/S/Kabir Elohim Isreal

Plaintiff, Pro se

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Aileene Chovance, Hector Claudio,)	
Guy Fraley, and Kenton Burtch)	
<i>Defendants,</i>)	

KABIR'S FIRST SET OF REQUESTS FOR PRODUCTIONS ²

COMES NOW, Kabir Elohim Isreal (hereinafter "Plaintiff") pursuant to **Rule 34 (a) of the Federal Rules of Civil Procedure** to Requests for Productions (hereinafter "RFP") of Defendants as follows:

DEFINITIONS

- "Incident" refers to the events on **MARCH 21ST, 2023**, involving Plaintiff's interaction with Defendants Chovanec, Claudio, Burtch, and Fraley, as described in Plaintiff's Complaint and Defendants' Answer.
- "Communication" includes all written, electronic, or recorded exchanges, such as emails, texts, radio transmissions, or in-car computer messages.
- "Defendants" refers individually and collectively to Officers Chovanec, Claudio, Burtch, and Fraley.

RFP 1: All police reports, incident reports, field notes, or logs prepared by Defendants Chovanec, Claudio, Burtch, and Fraley relating to the Incident, including any initial observations, witness statements, or descriptions of Plaintiff's actions (e.g. flagging down officers, setting down a weapon, and claiming self-defense).

² Plaintiff hereby requests of Defendants a second set of 30 Requests for Productions and that he be allowed to request same until **JUNE 1ST, 2025**.

RFP 2: All body camera, dash camera, or other audiovisual recordings from Defendants Chovanec, Claudio, Burtch, or Fraley capturing the Incident, from the moment Plaintiff flagged down Chovanec and Claudio through Plaintiff's transfer to Milwaukee County Jail.

RFP 3: All recordings, transcripts, logs of radio communications, and in-car computer inquiries (e.g., warrant checks) made by Defendants Chovanec and Claudio during the Incident, including timestamps and content of messages to dispatch and other officers.

RFP 4: All records and screenshots of the warrant check conducted by Defendant Chovanec on the name "Kabir Elohim Isreal," including any results, error messages, and follow-up queries.

RFP 5: Copies of Milwaukee Police Department policies and training materials in effect on **MARCH 21ST, 2023**, regarding officer response to self-defense claims, detention without arrest, securing firearms, and use of police vehicles for non-arrested individuals.

RFP 6: All chain of custody logs, evidence receipts, and inventory records related to Plaintiff's gun and passport seized during the Incident, including dates, times, and identities of officers handling and retaining these items.

RFP 7: All disciplinary records, complaints, and performance evaluations from Defendants' personnel files with the Milwaukee Police Department and previous law enforcement jobs, limited to incidents involving excessive force, false statements, unlawful detention, unlawful seizure of property, and failure to intervene, from **JANUARY 1, 2020**, to the present.

RFP 8: All statements, interviews, reports from witnesses (e.g., bystanders, other officers), and investigative findings related to the shooting Plaintiff reported during the Incident, including any evidence of an "unknown shooter" or bullets striking a person.

RFP 9: Documentation and manufacturer specifications for the police vehicles used by Defendants on **MARCH 21ST, 2023**, detailing the operation of rear door locks.

RFP 10: All dispatch logs, GPS records, and time-stamped reports showing when Defendants Burtch and Fraley arrived at the scene, when Plaintiff was moved between vehicles, and when he was transported to Milwaukee County Jail.

RFP 11: All booking sheets, arrest reports, and jail intake documents related to Plaintiff's transport to Milwaukee County Jail on **MARCH 21ST, 2023**, including any notations about his arrest status and reasons for detention.

RFP 12: All communications (e.g., emails, texts, radio calls) between Defendants during and after the Incident, from **MARCH 21ST, 2023**, to **MARCH 24TH, 2023**, regarding Plaintiff, his identity, and the investigation.

RFP 13: Records of Defendants' training on constitutional rights, probable cause, and detention procedures completed prior to **MARCH 21ST, 2023**.

DRAFTED & SUBMITTED MARCH 3RD, 2025.

/Kabir Elohim Isreal

/S/Kabir Elohim Isreal

Plaintiff, Pro se

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